

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
v.) CRIM. NO. 21-cr-10184-NMG
SHERRIFF COOPER,)
Defendant.)

MOTION TO SEAL
(assented to)

NOW COMES stand-by counsel for the Defendant, SHERIFF COOPER, who is proceeding *pro-se*, and moves to seal two sets of exhibits that are being filed contemporaneously with this motion. Undersigned counsel has consulted with the government regarding this request; the government does not object to this motion.

As grounds, stand-by counsel states that the exhibits, which pertain to motions filed by the defendant at ECF 92 and ECF 93¹, contain material which comes within the Protective Order in the case, pertains to or depicts Minor A, or is otherwise sensitive.

As such, it is in the interest of justice that the exhibits remain under seal until further Order of the Court.

¹ The Exhibits are provided on a thumb drive that is being filed today. The files are in folders named 92 and 93, and contain exhibits A through I, and A through D, respectively. The files on the thumb drive are PDF files, with the exception of Exhibit I to ECF 92, which consists of MP4 video files.

Respectfully submitted,
SHERIFF COOPER,
By his attorney,

/s/Ian Gold
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Date: Dec. 1, 2022

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this date, Dec. 1, 2022..

/s/ Ian Gold